



Hydrocarbon Recovery Services

173B

December 21, 1990

Morris Kay
United States Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 60101

RECEIVED

DEC 31 1990

USEPA, RCRA Branch

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Re: Hydrocarbon Recovery Services, Inc. of Wichita, EPA ID.
No. KSD007246846, 40 CFR part 265, Subpart BB Program

Mr. Kay:

This letter is sent to notify you that, pursuant to paragraph 265.1061, subparagraph (b), Hydrocarbon Recovery Services, Inc. of Wichita (HRS) is electing to comply with the "2 percent of all valves leaking" standard as an alternative to monthly monitoring of it's valve equipment in hazardous waste light organic liquid service. A performance test of the applicable equipment was completed at our facility on December 17, 1990 and 0% were found to exceed the 500 ppm emission standard. If a leak is detected in any of this equipment it will be repaired pursuant to paragraph 265.1057 (d) and (e). Should you or your staff have any questions please contact me at 316-268-9490.

Sincerely,
HYDROCARBON RECOVERY SERVICES, INC. OF WICHITA

Stephen M Keiter

Stephen Keiter

cc: Thomas Gross, KDHE BOWM
Catherine Orban, HRS-Tulsa
Dave Coker, USPCI-Houston



R00001654

RCRA Records Center

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January 4, 1991

MEMORANDUM

SUBJECT: Letter from Hydrocarbon Recovery Services, Inc. of
Wichita, dated December 21, 1990

FROM: Sandi MacLeod *SPM*
RCRA Compliance Section

TO: David Doyle
Chief, RCRA Compliance Section

The letter from Hydrocarbon Recovery Services, Inc. of Wichita, dated December 21, 1990, concerns the new TSD Air Emission Standards for Equipment Leaks (40 CFR Part 265 Subpart BB). 40 CFR Part 265.1057 provides the owner/operator with the standards for valves in gas/vapor service or in light liquid service. 40 CFR Parts 265.1061 and 265.1062, however, provide the owner/operator with alternative standards by which to operate, instead of Part 265.1057, which requires monthly monitoring of the valves.

Hydrocarbon Recovery Services, Inc. (HRS) has chosen to follow Part 265.1061 (percentage of valves allowed to leak), which allows no greater than 2 percent of the valves to leak. Part 265.1061 requires that the owner/operator notify the Regional Administrator that he has elected to comply with this section of the regulations, which is what the letter from HRS does. This section also requires that a performance test be conducted initially, annually, and at other times requested by the Regional Administrator. HRS states in the letter that it has conducted the initial performance test.

I think that this letter should go to the Permits section. Let me know if you have any questions.

USPCI

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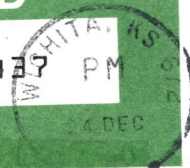
2549 North New York Street
Wichita, Kansas 67219

Hydrocarbon Recovery Services

CERTIFIED

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MAIL



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